

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 1:14-CR-82-HSO-RHW

KAMRAN PAHLAVAN

MOTION TO CONTINUE

COMES Defendant Kamran Pahlavan, through Counsel, and moves to continue the scheduled trial on February 23rd, 2015, along with the deadlines associated with the trial, and for reasons states as follows:

1. That discovery has been provided to the Defendant by the Government today.
2. That filing and notification deadlines set out in the Court's trial scheduling order will begin to expire prior to Counsel for the Defendant having the opportunity to review all discovery. As a result, Counsel cannot adequately consider, prepare, and file appropriate motions and effectively represent his client.
3. That Counsel has been advised that the Government does not object to this motion.
4. That the Defendant herein expressly waives his right to a speedy trial.
5. That based on the foregoing, Counsel respectfully moves this Honorable Court to continue this case. Furthermore, the ends of justice would be served by granting a continuance in this cause and the need for such a continuance outweighs the best interest of the public and the Defendant to a speedy trial in this case.

WHEREFORE, PREMISES CONSIDERED, Counsel for the Defendant Kamran Pahlavan respectfully moves this Honorable Court to enter an order continuing the trial of this case.

Respectfully submitted, this the 15th day of January, 2015.

By: /s/ Peter H. Barrett
PETER H. BARRETT (MSB #2069)

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CERTIFICATE OF SERVICE

I, Peter H. Barrett, do hereby certify that I have this date electronically filed the foregoing *Motion to Continue* with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to all counsel of record.

THIS, the 15th day of January, 2015.

/s/ Peter H. Barrett
PETER H. BARRETT